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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
OPPOSITION TO DEFENDANTS UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO, LLC'S MOTION FOR
RELIEF FROM AND EMERGENCY
MOTION FOR STAY OF NON-
DISPOSITIVE PRETRIAL ORDER OF
MAGISTRATE JUDGE (DKT. 951)**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
7 Seal Portions of Its Opposition to Defendants Uber Technologies, Inc. and Ottomotto, LLC’s Motion
8 for Relief from and Emergency Motion for Stay of Non-Dispositive Pretrial Order of Magistrate Judge
9 (Dkt. 951), filed concurrently herewith (the “Administrative Motion”). The Administrative Motion
10 seeks an order sealing the following materials filed concurrently herewith:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Opposition to Defendants Uber Technologies, Inc. and Ottomotto, LLC’s Motion for Relief from and Emergency Motion for Stay of Non-Dispositive Pretrial Order of Magistrate Judge (Dkt. 951) (“Waymo’s Opposition”)	Highlighted Portions	Waymo (green highlighting)

19 3. Specifically, Waymo’s Opposition contains or refers to trade secret and confidential
20 business information, which Waymo seeks to seal.

21 4. Portions of Waymo’s Opposition (portions highlighted in green) contain, reference,
22 and/or describe Waymo’s asserted trade secrets. The information Waymo seeks to seal includes the
23 confidential design and functionality of Waymo’s proprietary autonomous vehicle system, which
24 Waymo maintains as secret. I understand that these trade secrets are maintained as secret by Waymo
25 (Dkt. 25-47) and are valuable as trade secrets to Waymo’s business (Dkt. 25-31). The public
26 disclosure of this information would give Waymo’s competitors access to in-depth descriptions—and
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28

1 analysis—of the functionality of Waymo’s autonomous vehicle system. If such information were
2 made public, I understand that Waymo’s competitive standing would be significantly harmed.

3 5. Waymo’s request to seal is narrowly tailored to those portions of Waymo’s Opposition
4 that merit sealing, and the scope of information that Waymo is seeking to seal is consistent with other
5 administrative motions to seal that have already been granted by the Court in this case. (*See, e.g.*, Dkt.
6 416, 414, 406, 393, 392.)

7 I declare under penalty of perjury under the laws of the State of California and the United
8 States of America that the foregoing is true and correct, and that this declaration was executed in San
9 Francisco, California, on July 27, 2017.

10 By /s/ Felipe Corredor

11 Felipe Corredor

12 Attorneys for WAYMO LLC
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15 **SIGNATURE ATTESTATION**

16 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
17 filing of this document has been obtained from Felipe Corredor.

18 /s/ Charles K. Verhoeven

19 Charles K. Verhoeven
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